

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

JANE DOE, a minor, by and through her
mother and next friend, MOTHER DOE,

Plaintiff,

v.

ACADEMIR CHARTER SCHOOLS, INC.,
and SUPERIOR CHARTER SCHOOL
SERVICES, INC.,

Defendants.

CASE NO.: 1:23-cv-23004-JB

____ Evidentiary
☒ Trial
 ____ Other

EXHIBIT LIST

____ Government ☒ Plaintiff ☒ Defendants ____ Court

Exhibit No.	Date Identified	Date Admitted	Witness	Objection	Description of Exhibit
1					Miami-Dade Police Department Offense-Incident Report (Plaintiff JD000001-JD000003)
2					Miami-Dade Police Department Case Card (Plaintiff JD000004)
3				Hearsay	Transcript of Interview of Jane Doe by Dr. Gregory Iannuzzi, MD (Plaintiff JD000005-JD000083)
4				Hearsay	Transcript of Audio Recording of Jane Doe and Mother Doe (Plaintiff JD000084-JD000087)
5					Messages between Doe Parents and Hira Chaudry (Plaintiff JD000088)
6					Text Message Exchange between Mother Doe and Rolando Mir (Plaintiff JD000089-JD000098)

7					Messages between Mother Doe and Rolando Mir (Plaintiff JD000089-JD000098) (Translated)
8					Miami-Dade Police body-worn camera footage of interaction between Officer N. Almaguer and Susie Bello and Melissa Valladares (Plaintiff JD000099)
9				Hearsay	Audio Recording of Conversation between Jane Doe and Mother Doe (Plaintiff JD000100)
10					Referral Action Codes (Plaintiff JD000101)
11					ACSW 2022-2023 Parent/Student Handbook (Plaintiff JD000102-JD000141)
12					ACSW 2023-2024 Parent/Student Handbook (Plaintiff JD000142-JD000181)
13					ACSW 2024-2025 Parent/Student Handbook (Plaintiff JD000182-JD000228)
14					Screen Recording of Text Message Exchange between Mother Doe and Rolando Mir (Plaintiff JD000229)
15				Relevance	Academir Charter Schools Inc. Board Meeting Minutes for 2020-2024 (Plaintiff JD000230-JD000311)
16					Miami-Dade Police body-worn camera footage of interaction between officers and Father Doe (Plaintiff JD000312)
17					Miami-Dade Police body-worn camera footage of interaction

					between officers and Father Doe (Plaintiff JD000313)
18				Relevance Hearsay	Press Report of Incident at Florida International University (Plaintiff JD000314)
19					Miami-Dade Police body-worn camera footage of interaction of officers with Father Doe and Defendants' representatives and/or employees (Plaintiff JD000315)
20					Miami-Dade Police body-worn camera footage of interaction of officers with Father Doe (Plaintiff JD000316)
21				Relevance	Academir Charter School of Osceola (Plaintiff JD000317-JD000848)
22					Academirix.com Website Homepage (Plaintiff JD000849)
23					Academirix.com Website Homepage (Plaintiff JD000850)
24					Title IX Complaint Form on Academirix.com Website (Plaintiff JD000851-JD000852)
25				Relevance	Registration Information for Academirix.com Domain (Plaintiff JD000853)
26				Relevance Hearsay	Discrimination/Harassment Advisory (Plaintiff JD000854)
27				Relevance Hearsay	Letter of ADP dated July 10, 2024 (Plaintiff JD000855)
28				Hearsay	Report of the Florida Department of Children and Families (Plaintiff DCF000001-DCF000014)

Commented [JK1]: Kyle, can you confirm that the entirety of the interaction with Father Doe is on the list- just want to make sure we arent only listing bits and pieces of it?

Commented [JK2]: I am missing these bates numbers so not sure what this is

Commented [JK3]: Need a copy of these please

Commented [JK4]: Need copies of exhibits 21 thru 27 please

Commented [JK5]: Kyle, I think this exhibit is misleading because you subpoenaed the wrong entity and Alice Quinn emailed you on 7/15/24 advising that Academir is a client of ADP TotalSource, Inc. and to subpoena their records.

29				Hearsay	Video Recording of Interview of Jane Doe by Dr. Gregory Iannuzzi, MD (Plaintiff GI000026)
30				Hearsay Relevance	Expert Report of Jim Stafford (Plaintiff JS000001-JS000018)
31					Curriculum Vitae of Jim Stafford (Plaintiff JS000019-JS000021)
32				Relevance	Forensic Service Agreement (Plaintiff JS000022-JS000027)
33					Accident/Incident Report
34					Student Case Management – Student Service Form, FM-3673
35					Student Case Management Referral Form, FM-2981
36					Defendant Academir’s Initial Disclosures
37					Defendant Academir’s Updated Initial Disclosures
38					Defendant Superior’s Initial Disclosures
39					Defendant Academir Charter School, Inc.’s Answers to Plaintiff’s [First Set of] Interrogatories
40					Defendant Academir Charter School, Inc.’s Answers to Plaintiff’s [First] Request for Production
41					Defendant Superior Charter School Services, Inc.’s Answers to Plaintiff’s [First Set of] Interrogatories
42					Defendant Superior Charter School

					Services, Inc.'s Responses to Plaintiff's [First] Request for Production
43					Defendant Academir Charter School, Inc.'s Amended Answers to Plaintiff's [First Set of] Interrogatories
44					Defendant Academir Charter School, Inc.'s Amended Responses to Plaintiff's [First] Request for Production
45					Defendant Superior Charter School Services, Inc.'s Amended Answers to Plaintiff's [First Set of] Interrogatories
46					Defendant Superior Charter School Services, Inc.'s Amended Responses to Plaintiff's [First] Request for Production
47					Defendant Academir Charter School, Inc.'s Answers to Plaintiff's Second Set of Interrogatories
48					Defendant Academir Charter School, Inc.'s Responses to Plaintiff's Second Request for Production
49					Defendant Superior Charter School Services, Inc.'s Answers to Plaintiff's Second Set of Interrogatories
50					Defendant Superior Charter School Services, Inc.'s Responses to Plaintiff's Second Request for Production
51					Defendant Superior Charter School Services, Inc.'s Amended Answers

					to Plaintiff's Second Set of Interrogatories
52					Defendant Superior Charter School Services, Inc.'s Amended Responses to Plaintiff's Second Request for Production
53					Transcript of May 8, 2024, Rule 30(b)(6) deposition of Rolando Mir
54					Transcript of May 9, 2024, Rule 30(b)(6) deposition of Olivia Bernal
55					2023-2024 Title IX Policies and Procedures
56				Relevance	Title IX Manual Metadata I and 2022-2023 Title IX Policies and Procedures (original file name: "Original Electronic Manual File Metadata Creation and Modification.pdf")
57				Relevance	Title IX Manual Metadata II (original file name: "Document Properties.docx")
58					Sworn Declaration of Academir Charter Schools, Inc.
59					Sworn Declaration of Superior Charter School Services, Inc.
60				Relevance	Email from Defendants' counsel Chris Lawson dated June 7, 2024
61					Miami-Dade Code of Student Conduct
62					Miami-Dade/OCRC Title IX Manual
63					Academir Employee Handbook 2023-2024

64					Transcript of August 26, 2024, deposition of Mother Doe
65					Transcript of August 28, 2024, deposition of Mother Doe
66					Transcript of August 26, 2024, deposition of Father Doe
67				Subject to relevance and hearsay objections	Transcript of September 25, 2024, deposition of Gregory Iannuzzi, M.D.
68				Subject to relevance and hearsay objections	Transcript of September 11, 2024, deposition of Jim Stafford
69					Miami-Dade Police body-worn camera footage of interaction between officers and Father Doe (complete unedited or redacted version)